

MBH

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

RECEIVED

AUG 23 2022

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

KATHY TRAVIS

Plaintiff(s),

vs.

Sam C. Pitassi

Melrose Park Police Dept,

etc, all

Defendant(s).

1:22-cv-04474

Judge Jorge L. Alonso

Magistrate Judge Sunil R. Harjani

RANDOM

Travis v. Pitassi, et al

COMPLAINT FOR VIOLATION OF CONSTITUTIONAL RIGHTS

This form complaint is designed to help you, as a pro se plaintiff, state your case in a clear manner. Please read the directions and the numbered paragraphs carefully. Some paragraphs may not apply to you. You may cross out paragraphs that do not apply to you. All references to "plaintiff" and "defendant" are stated in the singular but will apply to more than one plaintiff or defendant if that is the nature of the case.

1. This is a claim for violation of plaintiff's civil rights as protected by the Constitution and laws of the United States under 42 U.S.C. §§ 1983, 1985, and 1986.
2. The court has jurisdiction under 28 U.S.C. §§ 1343 and 1367.
3. Plaintiff's full name is KATHY TRAVIS.

If there are additional plaintiffs, fill in the above information as to the first-named plaintiff and complete the information for each additional plaintiff on an extra sheet.

4. Defendant, Sam C. Pitassi, is
(name, badge number if known)

☒ an officer or official employed by Melrose Park Police Department;
(department or agency of government)
_____ or

☐ an individual not employed by a governmental entity.

If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.

5. The municipality, township or county under whose authority defendant officer or official acted is Melrose Park. As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.

6. On or about _____, at approximately _____ ☐ a.m. ☐ p.m.
(month, day, year)
plaintiff was present in the municipality (or unincorporated area) of _____
_____, in the County of _____,
State of Illinois, at _____,
(identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows (*Place X in each box that applies*):

- ☐ arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
- ☐ searched plaintiff or his property without a warrant and without reasonable cause;
- ☐ used excessive force upon plaintiff;
- ☐ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
- ☐ failed to provide plaintiff with needed medical care;
- ☒ conspired together to violate one or more of plaintiff's civil rights;
- ☐ Other:

7. Defendant officer or official acted pursuant to a custom or policy of defendant municipality, county or township, which custom or policy is the following: **(Leave blank if no custom or policy is alleged):** _____

8. Plaintiff was charged with one or more crimes, specifically:

NONE

9. **(Place an X in the box that applies. If none applies, you may describe the criminal proceedings under "Other")** The criminal proceedings

- ☐ are still pending.
- ☐ were terminated in favor of plaintiff in a manner indicating plaintiff was innocent.¹
- ☐ Plaintiff was found guilty of one or more charges because defendant deprived me of a fair trial as follows _____

☒ Other: The defendants conspired together with other law enforcement officers to violate the Plaintiff's civil rights. Discrimination on the basis of religion and discriminatory treatment by officers.

¹Examples of termination in favor of the plaintiff in a manner indicating plaintiff was innocent may include a judgment of not guilty, reversal of a conviction on direct appeal, expungement of the conviction, a voluntary dismissal (SOL) by the prosecutor, or a *nolle prosequi* order.

10. Plaintiff further alleges as follows: *(Describe what happened that you believe supports your claims. To the extent possible, be specific as to your own actions and the actions of each defendant.)*

The defendants along with several others in law enforcement conspired together to violate the Plaintiffs rights. The defendants conspired with other local law enforcement agencies to engage in the abusive pattern / practice of conduct that violated the Plaintiff's civil rights. The abusive conduct also includes. Abusive treatment in public places, slander, defamation, noise making around the plaintiff's home with helicopters and motor vehicles. The recruitment of community residents to harass the Plaintiff in public places creating a "Hostile Environment".

In addition to the discriminatory treatment the defendants targeted the Plaintiff and was racially profiled based on her religious beliefs. The harassment has been so extreme that it goes beyond all reasonable bounds of decency.

11. Defendant acted knowingly, intentionally, willfully and maliciously.

12. As a result of defendant's conduct, plaintiff was injured as follows:

The outrageous conduct has caused the Plaintiff severe emotional distress that no reasonable person is expected to endure. Highly offensive, unpleasant and caused an extreme amount of fright, grief humiliation, anger and worry. The intentional infliction of Emotional distress that was purposely caused upon the plaintiff was intentional and purposely to cause her mental anguish. The defendants acts and actions were racially motivated, discriminatory, Abusive and has been extremely horrendous.

13. Plaintiff asks that the case be tried by a jury. ☒ Yes ☐ No

14. Plaintiff also claims violation of rights that may be protected by the laws of Illinois, such as false arrest, assault, battery, false imprisonment, malicious prosecution, conspiracy, and/or any other claim that may be supported by the allegations of this complaint.

WHEREFORE, plaintiff asks for the following relief:

- A. Damages to compensate for all bodily harm, emotional harm, pain and suffering, loss of income, loss of enjoyment of life, property damage and any other injuries inflicted by defendant;
- B. ☒ (Place X in box if you are seeking punitive damages.) Punitive damages against the individual defendant; and
- C. Such injunctive, declaratory, or other relief as may be appropriate, including attorney's fees and reasonable expenses as authorized by 42 U.S.C. § 1988.

Plaintiff's signature: 

Plaintiff's name (print clearly or type): Kathy Travis

Plaintiff's mailing address: 1318 S. 7th Avenue

City Maywood State IL ZIP 60153

Plaintiff's telephone number: (630) 269-5491

Plaintiff's email address (if you prefer to be contacted by email): Kathytravis82@gmail.com

15. Plaintiff has previously filed a case in this district. ☒ Yes ☐ No

If yes, please list the cases below.

Travis v. Triton College

Any additional plaintiffs must sign the complaint and provide the same information as the first plaintiff. An additional signature page may be added.